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December 20, 2006

VIA ELECTRONIC FILING

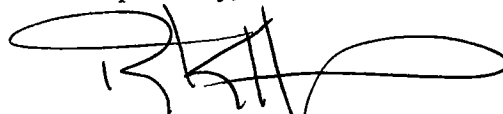
The Honorable Gregory M. Sleet
United States District Court for the District of Delaware
844 King Street
Wilmington, Delaware 19801

Re: *Automotive Technologies International, Inc. v. American Honda Motor Company, Inc., et al.*, Civil Action No. 06-187-GMS

Your Honor:

Plaintiff would like to supplement the record regarding the Motion to Transfer filed by the Honda Defendants. We wish to bring to the Court's attention the attached Amended Initial Disclosures filed by Defendant Elesys on December 18, 2006. In evaluating the asserted inconvenience of Delaware, it is noted that Elesys now lists five new witnesses in Japan, and two new witnesses in Austin Texas (Freescale Semiconductor, Inc.).

Respectfully,



Richard K. Herrmann, #405
rherrmann@morrisjames.com

RKH/tp

Attachment

cc: Thomas C. Grimm, Esq. (via email)
Ralph J. Gabric, Esq. (via email)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AUTOMOTIVE TECHNOLOGIES
INTERNATIONAL, INC.,

Plaintiff,

v.

ELESYS NORTH AMERICA INC. ET AL
Defendants.

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) Civil Action No. 06-187-GMS
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**DEFENDANT AND COUNTERCLAIM PLAINTIFF ELESYS NORTH AMERICA
INC.'S SUPPLEMENTAL AND AMENDED INITIAL DISCLOSURES PURSUANT
TO FED. R. CIV. P. 26(e)**

Elesys North American, Inc. ("Elesys") supplements and amends its initial disclosures based upon its continuing investigation to date. Elesys notes that its investigation is ongoing and reserves the right to further modify, amend, or otherwise supplement these disclosures as additional information becomes available during the course of this lawsuit.

INITIAL DISCLOSURE

A. WITNESSES

Subject to and without waiving the limitations set forth above, Elesys is currently aware of the following individuals who may have discoverable information that may be used to support Elesys's claims and/or defenses.

1. David S. Breed
Chairman and CEO
ATI, Inc.
Boonton Township, New Jersey

Development of the alleged inventions of the patents in suit;
prosecution of patents in suit and prior art; attempts to
commercialize the subject matter of the patents in suit; attempts to
license the patents in suit

2. Wilbur Duvall
Reed Springs, Missouri

Development of the alleged inventions of the patents in suit;
prosecution of patents in suit and prior art

3. Wendell C. Johnson
210 Riverside Ave.
Chowchilla, CA 93610

Development of the alleged inventions of the patents in suit;
prosecution of patents in suit and prior art

4. Andrew J. Varga
29292 Marvin Road
Farmington Hill, MI 48331

Development of the alleged inventions of the patents in suit;
prosecution of patents in suit and prior art

5. Jeffrey L. Morin
911 Saint Johns Blvd.
Lincoln Park, MI 48146

Development of the alleged inventions of the patents in suit;
prosecution of patents in suit and prior art

6. Kunhong Xu
2792 Broadmoor Drive
Rochester Hill, MI 48309

Development of the alleged inventions of the patents in suit;
prosecution of patents in suit and prior art

7. Tie-Qi Chen
Cousineau Road
Windsor, ON N9H
Canada

Development of the alleged inventions of the patents in suit;
prosecution of patents in suit and prior art

8. Michael E. Kussal
Kiev, Ukraine

Development of the alleged inventions of the patents in suit;
prosecution of patents in suit and prior art

9. Karl Milde, Esq.
Westchester County, New York

Prosecution of patents in suit and prior art
10. Samuel Shipkovitz, Esq.
5829 Nicholson Street
Pittsburgh, PA 15217

Prosecution of the patents in suit and prior art
11. Brian Roffe, Esq.
11 Sunrise Plaza
Suite 303
Valley Stream, New York 11580-6111

Prosecution of patents in suit and prior art
12. Susan McCarthy
Former General Manager
Elesys North America, Inc.

Sales and marketing of the accused Elesys products
13. Esther Anderson
Systems Engineer
Elesys North America, Inc.

Operation of the accused Elesys products
14. Greg Thompson
Former Sr. Manager, Systems Engineer
Elesys North America, Inc.

Development, design and operation of the accused Elesys
products; prior art systems
15. Angus Shieh
Former Sr. Manager
Elesys North America, Inc.

Development, design and operation of the accused Elesys
products; prior art systems

16. Archie England
Sr. Manager
Elesys North America, Inc.

Development, design and operation of the accused Elesys products; prior art systems
17. Masahiro Miyamori
Sr. Manager
Elesys North America, Inc.

Development, design and operation of the accused Elesys products; prior art systems
18. Fred Kirksey
Former Engineer
Elesys North America, Inc.

Development, design and operation of the accused Elesys products; prior art systems
19. Gin Moyer
Elesys North America, Inc.

Financial information concerning the accused Elesys products
20. Satoshi Baba
Honda-Elesys Co., Ltd.
Japan

Development of the accused Elesys products; prior art systems
21. Yoshitaka Oka
Honda-Elesys Co., Ltd.
Japan

Development of the accused Elesys products; prior art systems
22. Kazuyuki Sekine
Honda-Elesys Co., Ltd.
Japan

Development of the accused Elesys products; prior art systems

23. Hitoshi Kaburagi
Honda-Elesys Co., Ltd.
Japan

Development of the accused Elesys products; prior art systems
24. Hiroshi Oikawa
Honda-Elesys Co., Ltd.
Japan

Development of the accused Elesys products; prior art systems
25. Masahiko Fujii
Honda-Elesys Co., Ltd.
Japan

Development of the accused Elesys products; prior art systems
26. Keiichi Hasegawa
Honda-Elesys Co., Ltd.
Japan

Development of the accused Elesys products, prior art systems
27. Kazunori Jinno
Honda-Elesys Co., Ltd.
Japan

Development of the accused Elesys products; prior art systems
28. Ron DeLong
Freescale Semiconductor, Inc.

Development of the ASIC used in the accused Elesys products
29. Ryozo Nakamura
Freescale Semiconductor, Inc.

Development of the ASIC used in the accused Elesys products
30. Philip Rittmueller
St. Charles, IL

Development, design and operation of the accused Elesys products; prior art systems; pre-lawsuit discussion with ATI concerning one or more of the patents in suit

31. Joshua Smith
Intel Corporation

Prior art, and development of efield sensing

32. Dr. Neil Gershenfeld
Director
M.I.T. Media Lab

Prior art, and development of efield sensing

B. DOCUMENTS

Based upon information reasonably available to Elesys at this time, and subject to the limitations set forth above, the following categories of documents and things that are in the possession, custody and control of Elesys and which may be used to support Elesys's claims and defenses:

1. The patents in suit;
2. The file histories of the patents in suit;
3. Documents showing the operation and configuration of the accused Elesys products;
4. Documents relating to the development, testing, calibration and marketing of the accused Elesys products;
5. Documents relating and/or constituting prior art in the field of occupant sensing and detection;
6. Documents relating to the costs, revenues and margins associated with the accused Elesys products;
7. Documents relating to the development of the accused Elesys products; and

8. Documents relating to the installation of the accused Elesys products into automobiles sold by General Motors Corporation and American Honda Motor Co., Inc.

These documents are likely to be located at 44191 Plymouth Oaks, Blvd., Suite 1200, Plymouth, Michigan 48170; 455 N. Cityfront Plaza Drive, Chicago, Illinois 60611; and 70 Crestridge Drive, Suite 150, Suwanee, GA 30024.

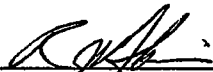
C. COMPUTATION OF DAMAGES

Among other possible relief, Elesys is seeking its attorneys' fees under 35 U.S.C. § 285, as this is an exceptional case. Elesys will also seek prejudgment interest. As of this time, Elesys measure of damages is yet undetermined.

D. INSURANCE AGREEMENTS

As presently advised, Elesys is unaware of any insurance agreement under which someone carrying on an insurance business may be liable to satisfy part or all of a judgment that may be entered in this action or to indemnify or reimburse Elesys for payments made to satisfy any judgment in this action.

BRINKS HOFER GILSON & LIONE



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December 18, 2006

CERTIFICATE OF SERVICE

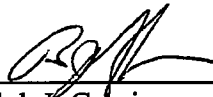
I hereby certify that true and correct copies of the foregoing were caused to be served on December 18, 2006, upon the following individuals in the manner indicated:

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